

Matthew F. Wegner
9500 Ray White Road
Suite 200
Fort Worth, TX 76244
817-494-3344
matthew@attorneywegner.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	CASE NO: 24-40703
	§	
John Meritt	§	
Loretta Meritt	§	
Debtors	§	
	§	
	§	

OBJECTION TO PROOF OF CLAIM NO. 03
FILED BY TEXAS WORKFORCE COMMISSION

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT ELDON B. MAHON U.S. COURTHOUSE, 501 W. TENTH STREET, FORT WORTH, TX 76102-3643 BEFORE THE CLOSE OF BUSINESS ON April 17, 2024, WHICH IS AT LEAST 30 DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING WILL BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

TO THE HONORABLE JUDGE MARK X. MULLIN, UNITED STATES BANKRUPTCY
JUDGE:

John and Loretta Meritt Debtors, file this *Objection to Proof of Claim No. 03 filed by Texas Workforce Commission*, and would respectfully show as follows:

1. On February 29, 2024, the Debtors filed a voluntary petition in this Court for relief under chapter 13 of the United States Bankruptcy code.

2. The Court has jurisdiction over this matter under 28 U.S.C. §§ 1334 and 157. This matter constitutes a “core” proceeding within the meaning of 28 U.S.C. § 157(b)(2).

3. Texas Workforce Commission, filed a proof of claim asserting a unsecured claim in the amount of \$31,982.00, which was docketed as Claim No. 03 on the Court’s ECF claims register for this case (the “Subject Claim”).

4. Debtor Objects to Proof of Claim on the basis She reported to unemployment every time she received a job and then was subsequently let go during the time period of the claim. She would then reapply for unemployment. She did not receive any funds from unemployment while she was employed during that time period.

WHEREFORE, PREMISES CONSIDERED the Debtor requests that the Court disallow Claim No. 03 of Texas Workforce Commission, and for such other and further relief to which she may show herself justly entitled.

Respectfully submitted,

/s/Matthew F. Wegner
Matthew F. Wegner
SBOT 24031234
9500 Ray White Road
Suite 200
Fort Worth, TX 76244
817-494-3344
matthew@attorneywegner.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served concurrently with the filing of the same (a) by ECF upon all persons who have filed ECF appearances in this case, including counsel of record for the Creditor, the Trustee, The office of the United States Trustee, and all persons and entities requesting notice under Fed.R. Civ. P. 2002(m) and (b) by first class mail, postage prepaid on the following:

Texas Workforce Commission
Regulatory Integrity Division, Collectio
101 E 15th Street, Room 556
Austin, TX 78778-0001

/s/Matthew F. Wegner
Matthew F. Wegner